

REMARKS

The Examiner is thanked for the performance of a thorough search.

Claim 1 has been amended. Claims 2-3, 13-16, 18-19, and 29-32 have been canceled. Claims 33-38 have been added. Hence, Claims 1, 4-12, 17, 20-28, and 33-38 are pending in the present application.

By this amendment, paragraphs [0067]-[0077] have been added to the Specification. The subject matter of paragraphs [0067]-[0077] was previously disclosed in the Provisional Application (U.S. Provisional Application No. 60/416,306, filed on October 4, 2002), which was incorporated by reference into the present application at the time of filing and to which the present application claims priority.

Each issue raised in the Office Action mailed August 8, 2006 is addressed hereinafter.

I. ISSUES NOT RELATING TO THE PRIOR ART

A. AMENDMENTS TO THE SPECIFICATION

The Specification of the present application has been amended by adding paragraphs [0067]-[0077]. These paragraphs are virtual word for word extractions from the Provisional Application (U.S. Provisional Application No. 60/416,306, filed on October 4, 2002), which has been incorporated by reference into the present application at the time of filing.

Specifically, paragraphs [0067]-[0069] are described in pp.1-2 of the Provisional Application. Paragraphs [0070]-[0071] are described in p.1 of the Provisional Application. Paragraph [0072] is described in p. 67 of the Provisional Application. Paragraph [0073] is described in p. 71 of the Provisional Application. Paragraphs [0074]-[0075] are described in p. 1 of the Provisional Application. Paragraph [0076] is described in p. 66 of the Provisional Application. Paragraph [0077] is described in p. 67 of the Provisional Application.

For the above reasons, it is respectfully submitted that the addition of paragraphs [0067]-[0077] to the Specification does not introduce new matter in the present application.

B. AMENDMENTS TO THE CLAIMS

The amendment to Claim 1 is supported at least by paragraph [0023] at p. 9 of the Specification, which paragraph describes pseudo-code for moving data from the source directly into the a target in an iterative process that does not involve materializing the data in locations separate from the source and the target. Paragraphs [0071]-[0073], which have been herein added to the Specification, also support the amendment to Claim 1.

New Claim 33 includes features previously included in Claim 1. New Claim 34 is supported at least by paragraphs [0068]-[0069], which have been herein added to the Specification. New Claim 35 is supported at least by paragraph [0043] at pp. 17-18 of the Specification, as well as paragraphs [0075]-[0077] which have been herein added to the Specification.

For the above reasons, it is respectfully submitted that the amendment to Claim 1 and the new claims do not introduce new matter in the present application.

II. ISSUES RELATING TO THE PRIOR ART

A. INDEPENDENT CLAIM 1

Claim 1 was rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Lau et al., U.S. Publication No. 2002/0184213 (“LAU”) in view of Vedula et al., U.S. Patent No. 6,823,495 (“VEDULA”).

Claim 1 comprises the features of:

...
using said mapping scheme to perform a single transformation that moves a set of data directly from said source into said target without materializing the

entire set of data separate from said source and said target during said transformation;
wherein said source is one of a relational database and an XML document and said target is the other of said relational database and said XML document;
....

It is respectfully submitted that the above feature of Claim 1 is not shown or suggested by any of the cited references.

Both LAU and VEDULA describe transformations that are performed by using XSLT style sheets. (See at least LAU - paragraphs [0054], [0080]; VEDULA – FIG. 2 and col. 9, lines 42-54). As is well known, XSLT style sheets are used to transform an XML source to an XML target, where XML schemas are required for both the XML source and the XML target. In contrast, Claim 1 features that one of the source or the target is a relational database which does not store data according to an XML schema.

It is also well known that performing XSLT transformations requires that the entire source data being transformed must be in an XML format before an XSLT style sheet is applied, and that the XSLT transformation returns as output the entire transformed data in XML format. Thus, when the source or the target is a relational database, performing an XSLT transformation necessarily involves an extra data transformation step. For example, when the source is a relational database, the entire source data for the XSLT transformation is extracted from the database and converted in proper XML format before the XSLT transformation can be performed. When the target is a relational database, the entire output data from the XSLT transformation is first generated in XML format before being inserted into the target relational database. In contrast, Claim 1 includes the feature of using a mapping scheme to perform a single transformation of a set of data directly from the source into the target without materializing the entire set of data separate from the source and the target during the transformation.

For these reasons, LAU and VEDULA whether taken alone or in combination do not teach or suggest all features of Claim 1. Thus, it is respectfully submitted that Claim 1 is patentable under 35 U.S.C. § 103(a) over LAU in view of VEDULA. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

B. DEPENDENT CLAIMS 4-12, 17, AND 20-28

Claims 4-12, 17, and 20-28 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over LAU in view of VEDULA.

Each of Claims 4-12, 17, and 20-28 depends directly or indirectly from independent Claim 1, and therefore includes each and every feature of the independent base claim. Thus, each of Claims 4-12, 17, and 20-28 is allowable for the reasons given above for Claim 1. In addition, each of Claims 4-12, 17, and 20-28 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 4-12, 17, and 20-28 are allowable for at least the reasons given above with respect to Claim 1. Reconsideration and withdrawal of the rejections of Claims 4-12, 17, and 20-28 is respectfully requested.

C. NEW CLAIMS 33-38

Each of new Claims 33-38 depends directly or indirectly from independent Claim 1, and therefore includes each and every feature of the independent base claim. Thus, each of Claims 33-38 is allowable for the reasons given above for Claim 1. In addition, each of Claims 33-38 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully

submitted that Claims 33-38 are allowable for at least the reasons given above with respect to Claim 1.

III. CONCLUSION

The Applicant believes that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicant respectfully submits that allowance of the pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.


The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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